



Association for Local Telecommunications Services

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

January 16, 1997

EX PARTE OR LATE FILED

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M St., N.W.
Washington, D.C. 20554

Re: Application by Ameritech Michigan Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Michigan; CC Docket 97-1.

Dear Mr. Caton:

Pursuant to §1.1206 of the Act (47 C.F.R. §1.1206), an original and one copy of this letter are hereby submitted. On January 14, 1997, representatives of the Association for Local Telecommunications Services (ALTS) including myself and Thomas Cohen of Davison & Cohen as well as Martin Clift and Larry Vanderveen from Brooks Fiber Properties, Alex Harris from MFS Communications (now Worldcom), and Gail Garfield Schwartz from TCG, met with the Policy Division of the Common Carrier Bureau, Richard Welch, Chief and Melissa Waxman and then the Chief of the Common Carrier Bureau, Regina Keeney, Deputy Bureau Chief, Richard Metzger and Associate Bureau Chief, Larry Atlas, to discuss the ALTS Motion to Dismiss in the above-captioned docket. During the course of discussion, not only were the legal justifications for the Motion reviewed but also factual problems that exist with the level of competition in the state of Michigan were presented by the ALTS members. The attached presentation was delivered by Mr. Martin Clift representing Brooks Fiber Properties. Kindly contact the undersigned if you have any questions in this matter.

Yours truly,

Heather Burnett Gold
President

cc: R. Keeney
A. R. Metzger
L. Atlas
R. Welch
M. Waxman

attachment

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BROOKS FIBER COMMUNICATIONS

Background

- » “Facilities-based” CLEC
- » Currently Serving Grand Rapids & Holland
 - ...Market size approx 400,000 lines
- » Interconnection Ordered by MPSC Feb. 95
- » Installed First Line May 95
- » MPSC Approved Interconnection Agreement Nov. 96
- » Only 17,000 Installed Lines (30% residential)

Interconnection Issues w/ Ameritech

- Discriminatory Treatment - Customer Installations
 - ... New installs delayed
 - ... No Ameritech Intralata Toll to Brooks Customers
- Lengthy Customer Cutovers
- Insufficient Ameritech Staffing to Cover Confirmed Cutovers
 - ... Results in unnecessary postponements & customer dissatisfaction
- Inadequate & Unreliable Ordering Interface Processes
- Disinformation or Refusing to Provide Complete Information to Brooks' Dispatch & Provisioning Departments
- Inadequate Billing Processes - no electronic transmission
- Incomplete Directory Agreements
- Outstanding Balance to Brooks for Mutual Compensation - \$1.0M
- Pre-Cutover and Post-Cutover "Win-back" Program



Necessary Compliance Items

- Immediate cessation of discriminatory treatment
- Revisions in Ameritech operating procedures to reduce cutover time
- Reliable and adequate electronic systems and interfaces for order processing and trouble reporting
- Electronic transmission of billing data
- Prompt payment of mutual compensation bills

Compliance over Sustained Period

